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Attorneys for Defendant Facebook, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

FACEBOOK, INC., a Delaware Corporation
headquartered in California,

Defendant.

Case No. 5:20-cv-08570-LHK

**STIPULATION TO ENTER
STIPULATED INTERIM
PROTECTIVE ORDER**

Judge: Hon. Lucy H. Koh

1 Defendant Facebook, Inc. (“Facebook” or “Defendant”) and Plaintiffs Maximilian
2 Klein, et al. (“Plaintiffs”), by and through their respective counsel, hereby stipulate as
3 follows:

4 WHEREAS, the parties are currently negotiating a final protective order and have
5 made substantial progress towards agreement on many provisions and narrowing their
6 disputes on others.

7 WHEREAS, the parties have agreed to exchange final positions by May 7 and
8 jointly submit any disputes to the Court in writing by May 14.

9 WHEREAS, per the Court’s April 2, 2021 Case Management Order (Dkt. 82),
10 Defendant is making a production to Plaintiffs on Monday, May 3.

11 WHEREAS, to govern that production, the parties stipulate to entry of this interim
12 protective order.

13 WHEREAS, this interim protective order is agreed to without prejudice to either
14 party asking for different, additional, or fewer provisions in the final protective order, and
15 the parties expressly acknowledge and stipulate that they will not rely on the provisions of
16 the interim protective order or their compromise on the interim order in support of their
17 respective arguments or proposals as to the terms that should govern the final protective
18 order in this matter.

19 WHEREAS, the parties hereby stipulate that this interim protective order shall
20 expire as soon as the final protective order is entered.

21 WHEREAS, the parties jointly and respectfully request that the Court enter the
22 parties’ Proposed Interim Stipulated Protective Order submitted herewith.

Dated: April 30, 2021

By /s/ Shana E. Scarlett

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SIGNATURE ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing. Pursuant to Civil Local Rule 5-1(i), I hereby attest that the other signatories have concurred in this filing.

Dated: April 30, 2021

By: /s/ Sonal N. Mehta
Sonal N. Mehta